

Subject: RE: Tri Star Responses to Second Set of Discovery Requests
Date: Wednesday, March 9, 2022 at 2:45:11 PM Central Standard Time
From: Tara Swafford
To: Daniel Arciniegas
Attachments: image001.jpg, image002.jpg

I meant to send that to Betsy -- thanks.

From: Tara Swafford
Sent: Wednesday, March 9, 2022 2:45 PM
To: Daniel Arciniegas <daniel@attorneydaniel.com>
Subject: RE: Tri Star Responses to Second Set of Discovery Requests

Let's discuss

From: Daniel Arciniegas <daniel@attorneydaniel.com>
Sent: Wednesday, March 9, 2022 2:43 PM
To: Betsy Hart <betsy@swaffordlawfirm.com>
Cc: Tara Swafford <tara@swaffordlawfirm.com>; roland@mumfordlaw.net
Subject: Re: Tri Star Responses to Second Set of Discovery Requests

Hey Betsy:

If we can have until March 31, 2022 to supplement the discovery you demanded today then I'm with fine the extension. Hopefully, the Court will enter a protective order by then. I'd like to see more production on the RFI justification and will renew my offer to keep it confidential as if the order you requested was entered until the Court enters a final order. I want to see it so we can make a settlement demand. The delay in this production is delaying potential settlement talks and racking up fees.

Enjoy your spring break.



Daniel Arciniegas

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From: Betsy Hart <betsy@swaffordlawfirm.com>
Date: Wednesday, March 9, 2022 at 1:20 PM
To: Daniel Arciniegas <daniel@attorneydaniel.com>
Cc: Tara Swafford <tara@swaffordlawfirm.com>, roland@mumfordlaw.net <roland@mumfordlaw.net>
Subject: Tri Star Responses to Second Set of Discovery Requests

Daniel,

We are working on responses to your second set of discovery requests but need some additional time as our contact has been out and spring break is next week. I have the responses due on March 17 right now. May we have until March 31, 2022 to get the responses to you? Please let me know today if you can, as I will be out next week. Thanks.



Elizabeth "Betsy" Hart
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